

EXHIBIT B

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

REPUBLICAN NATIONAL COMMITTEE;
DONALD J. TRUMP FOR PRESIDENT 2024,
INC.; MICHIGAN REPUBLICAN PARTY; and
RYAN KIDD, in his official capacity as Clerk of
Georgetown Township,

Plaintiffs,

v.

GRETCHEN WHITMER, in her official capacity
as Governor of Michigan; JOCELYN BENSON, in
her official capacity as Michigan Secretary of State;
JONATHAN BRATER, in his official capacity as
Director of the Michigan Bureau of Elections; U.S.
SMALL BUSINESS ADMINISTRATION;
ISABEL GUZMAN, in her official capacity as
Administrator of the Small Business
Administration; DEPARTMENT OF VETERANS
AFFAIRS; and DENIS McDONOUGH, in his
official capacity as Secretary of Veterans Affairs

Defendants.

CIVIL ACTION

Case No. 1:24-cv-720-PLM-SJB

Hon. Paul L. Maloney
Hon. Sally J. Berens

DECLARATION OF JANESEA GOLDBECK

I, Janessa Goldbeck, under penalty of perjury, hereby declare as follows:

1. I am over the age of 18, have personal knowledge of the facts below, and can competently testify to their truth.
2. My name is Janessa Goldbeck and I am currently the Chief Executive Officer at Vet Voice Foundation (“Vet Voice”) where I have worked for over two years.
3. Prior to becoming CEO of Vet Voice, I served for seven years as a commissioned combat engineer officer in the U.S. Marine Corps. I left the Marines in 2019 with the rank of captain. During my time in military service, I deployed to military installations throughout the

United States, and to Europe in support of NATO operations. I also performed many collateral duties while serving, including acting as my unit's Voting Assistance Officer.

4. Vet Voice is a national nonpartisan nonprofit organization, founded in 2009 and organized under Section 501(c)(3) of the Internal Revenue Code.

5. As Vet Voice's CEO, my responsibilities include managing personnel and overseeing the operations and funding of programs dedicated to serving our over 1.5 million subscribers across the country.

6. Vet Voice's subscribers are primarily active-duty military members, veterans, and their families. Each of our subscribers takes affirmative steps to receive communications from Vet Voice. Vet Voice has nearly 127,000 subscribers in Michigan.

7. In addition to serving its subscribers, Vet Voice is dedicated to empowering veterans across the country to become civic leaders and policy advocates. We provide the support, training, and tools veterans need to tackle public policy issues at home. We work on issues such as voting rights, combating disinformation, environmental protection, health care, jobs, and more.

8. As part of its work, Vet Voice sometimes lobbies the Department of Veterans Affairs ("VA") to adopt certain policies, particularly policies relating to provision of health care to veterans.

9. Increasing turnout among veterans and military voters—and ensuring that their ballots are counted when they do turn out—is critical to our mission. We are best able to achieve our goals by building the voting and organizing power of our constituents. Accordingly, a key part of our work is mobilizing our subscribers by giving them the knowledge and tools to successfully participate in elections. Vet Voice dedicates significant resources, including money, personnel time, and volunteers, to voter education and mobilization efforts.

10. Vet Voice also believes that growing the “veteran vote” benefits all Americans by engaging those who have served their country in the civic process. As a nonpartisan organization, Vet Voice works to increase turnout of not just its affirmative subscribers but the broader veteran and military community. We encourage each voter to participate in our democracy regardless of political beliefs or party membership.

11. To further that work, Vet Voice has built a first-of-its-kind military voter file covering nearly 14 million active duty, veteran, and military family voters. This voter file allows us to execute a cutting-edge, data-driven voter mobilization, education, and turnout effort. Our voter file includes over 357,000 voters in Michigan.

12. Vet Voice’s military voter file is critical to our efforts to target and turn out military voters at an unprecedented scale. In the 2020 election, Vet Voice volunteers sent 2.5 million texts to approximately 1.5 million veterans and military families, driving a significant increase in voter participation among those contacted. When engaged by a Vet Voice volunteer, voters in the lowest 40 percent of turnout propensity were three times more likely to vote early or by mail than peers who were not contacted.

13. Vet Voice is continuing to expand its military voter file as part of its growing efforts to mobilize the military and veteran community, including in Michigan. We are currently in the process of planning our voter engagement and education efforts for the 2024 election and expect to significantly build upon our success from the 2020 and 2022 election cycles.

14. At this time, Vet Voice has identified and plans to target approximately 70,000 individual veteran and military-affiliated voters in Michigan to mobilize them to vote in the 2024 elections using direct mail and text messages.

15. Vet Voice also engages in more traditional forms of voter engagement to educate voters. For instance, Vet Voice plans and executes direct mail campaigns that aim to inform voters about important voting deadlines, including deadlines to register. Vet Voice volunteers also conduct phone banking operations to transmit information about voting to military voters, including registration information. Vet Voice places digital advertising on social media and video platforms to further promote its message and mission. And Vet Voice sometimes advertises on rural radio stations to reach active-duty and military constituents about issues of importance.

16. Voter registration is foundational to every aspect of Vet Voice's voter engagement work. Because only voters who are registered are able to vote in Michigan, encouraging veterans to register is the first step in our voter engagement program in that state. Our turnout and issue education efforts are stymied when they reach veterans who are not registered and are not able to register in time to cast an effective vote.

17. Vet Voice is aware that since 2023 Michigan has authorized voter registration at VA offices. Vet Voice understands that the Plaintiffs in this case seek relief that would prevent VA offices from being used for voter registration in Michigan going forward.

18. Voter registration at VA offices is an invaluable option for Vet Voice's subscribers and other constituents. Most veterans—and many active-duty military—interact with the VA frequently. Offering voter registration at VA offices therefore gives veterans, their families, and many active-duty servicemembers an easy and convenient option for registering to vote or updating a registration.

19. In particular, many of Vet Voice's subscribers and constituents are veterans who suffer from physical disabilities—oftentimes disabilities resulting from their years of military service. According to Bureau of Labor Statistics figures from March 2024, 30 percent of all

veterans have a service-connected disability, including a remarkable 46 percent of veterans who have served since September 2001.¹ For such veterans, voter registration at VA offices is an important way to gain access to the franchise. Veterans with disabilities may face physical or other barriers to making a trip to the local clerk's office for the sole purpose of registering. But such veterans are likely to visit VA facilities frequently. By offering registration at VA offices, Michigan has taken a vital step to ensure that citizens who made great physical sacrifices for this country are able to participate fully in American democracy.

20. Plaintiffs' claims and request for relief in this case threaten access to the franchise in Michigan. And the burden of the relief Plaintiffs seek would fall disproportionately on veterans, who are by far the most likely group of voters to take advantage of voter registration at VA offices.

21. Vet Voice therefore has a strong interest in defending Michigan's designation of VA offices as voter registration locations, because eliminating voter registration at VA offices will harm (1) Vet Voice's mission of turning out as many veteran and military voters as possible; (2) Vet Voice's subscribers and constituents by depriving them of access to a convenient, effective option for registering to vote; and (3) Vet Voice's capacity to do other mission-critical election-year work—particularly educating and turning out already-registered voters by diverting its scarce resources toward registration efforts.

22. America's veterans put their lives, bodies, and health on the line to protect our freedoms, rights, and democracy. By virtue of their service, veterans have earned a sacred right to participate fully in our elections. This case threatens that right. Veterans should have a voice in its resolution.

¹ Bureau of Labor Statistics, *Employment Situation of Veterans – 2023* at 1 (Mar. 20, 2024), <https://www.bls.gov/news.release/pdf/vet.pdf>.

I certify under penalty of perjury that the foregoing is true and correct.

Executed on 7/24/2024

By: Janessa Goldbeck

Janessa Goldbeck
Chief Executive Officer
Vet Voice Foundation